UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

CIVIL NO. 12-cv-2039

(GAG)

Plaintiff

v.

PUERTO RICO POLICE DEPARTMENT and COMMONWEALTH OF PUERTO RICO,

Defendants.

MOTION TO RESTRICT

MAY IT PLEASE THE COURT:

COME NOW, Codefendants Commonwealth of Puerto Rico and the Puerto Rico Police Bureau ("PRPB"), through the undersigned attorneys, and very respectfully state and pray:

- 1. The Commonwealth filed today a motion in restricted mode at ECF No. 2482 regarding three implementation plans for Court's approval, as directed by the Court and in accordance with Standing Order No. 9, Amendment to the Restricted Filing and Viewing Levels Module, Misc. No. 03-149 (Jan. 30, 2013).
- 2. The Commonwealth seeks to restrict the motion because it pertains to matters that are restricted presently.

WHEREFORE, Defendant Commonwealth of Puerto Rico respectfully requests this Honorable Court to take notice of the above and grants this request to restrict the motion filed at ECF No. 2482.

WE HEREBY CERTIFY that on this same date, the forgoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to counsel for Plaintiff and all participants of record.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico on this 5th day of September, 2023.

S/ GABRIEL A. PEÑAGARÍCANO USDC PR: 212911 gpenagaricano@me.com

s/Rafael E. Barreto Solá USDC No. 211801 rbarreto@cnr.law

CANCIO, NADAL & RIVERA, LLC
PO Box 364966
San Juan, PR 00936-4966
Tel. (787) 767-9625
Fax (787) 622-2238/764-4430